

1 FELICIA GALATI, ESQ.
2 Nevada Bar No. 7341
3 OLSON CANNON GORMLEY & STOBERSKI
4 9950 West Cheyenne Avenue
5 Las Vegas, NV 89129
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9 Attorneys for Defendants
10 COUNTY OF CLARK, KIM KALLAS,
11 LISA RUIZ-LEE AND PAULA HAMMACK
12

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14
15 UNITED STATES DISTRICT COURT
16
17 CLARK COUNTY, NEVADA

18
19 SUSAN HOY, as Guardian Ad Litem for J.M.
20 and I.M., minors,

21 CASE NO. 2:20-CV-00103-GMN-VCF

22 Plaintiffs,

23 v.

24 ANDREA HERNANDEZ; WALDO
25 HERNANDEZ; LISA BROCHU; KIM
26 KALLAS; LISA RUIZ-LEE; PAULA
HAMMACK; DOE Individuals I-X; ROE
CLARK COUNTY DEPARTMENT OF
FAMILY SERVICES EMPLOYEES XI-XX,
individually and in their official capacities;
COUNTY OF CLARK, a political subdivision of
the State of Nevada; and ZOE CORPORATIONS
XXI-XXX,

27 Defendants.

28
**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(EIGHTH REQUEST)**

CLARK COUNTY,

23 Cross-Claimant

24 v.

25 ANDREA HERNANDEZ; WALDO
26 HERNANDEZ; MOES 1-10; and MOE
CORPORATIONS 11-20,

27 Cross-Defendants

Law Offices of
OLSON CANNON GORMLEY & STOBERSKI
A Professional Corporation
9950 West Cheyenne Avenue
Las Vegas, Nevada 89129
(702) 384-4012
Fax (702) 383-0701

ANDREA HERNANDEZ, WALDO
HERNANDEZ,

Cross-Claimants.

V.

CLARK COUNTY,

Cross-Defendant.

This Stipulation is being submitted because the parties inadvertently forgot to include the close of discovery deadline in their Stipulation filed on 1/11/2022. (ECF NO. 83). Pursuant to Fed R. Civ. P. 6, Fed. R. Civ. P. 26, LR IA 6-1, LR IA 6-2, LR 7-1, and LR 26-4, the parties, by and through their respective counsel of record, stipulate and agree that there is good cause to extend the close of discovery deadline for the reasons stated in the prior Stipulation (ECF No. 83) and consistent with this the Court's Order (ECF No. 84) filed on 1/12/2022 establishing the new discovery deadlines except for the close of discovery, which the parties inadvertently did not include.

I. Pursuant to LR 26-4(d), the parties stipulate to the following proposed schedule
for completing all remaining discovery:

The parties agree to extend all the relevant discovery deadlines by four weeks, as set forth below:

1. Extend the Close of Discovery date from 3/10/2022 to 4/7/2022:

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- 1
2. All the other case deadlines established by this Court's Order (ECF No. 84)
3
remain the same.
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5

6 DATED this 12th day of January, 2022.

7 DATED this 12th day of January, 2022.

8 /s/Marjorie Hauf, Esq.
9 Marjorie Hauf, Esq.
Nevada Bar No. 8111
10 Cara Xidis, Esq.
Nevada Bar No. 11743
H&P Law
11 8950 W. Tropicana Ave, Ste. 1
Las Vegas, NV 89147
Attorneys for the Plaintiffs

12 /s/Felicia Galati, Esq.
13 Felicia Galati, Esq.
Nevada Bar No. 7341
Olson Cannon Gormley & Stoberski
9950 West Cheyenne Avenue
Las Vegas, Nevada 89129
*Attorney for Defendants, Lisa Ruiz-Lee,
Paula Hammack, Kim Kallas and County
of Clark*

14 DATED this 12th day of January, 2022.

15 DATED this 14th day of January, 2022.

16 /s/Jonathan Blum, Esq.
17 Jonathan Blum, Esq.
Nevada Bar No. 9515
Wiley Peterson Law Offices
1050 Indigo Dr. Suite 200B
Las Vegas, NV 89145
Attorney for Defendant, Lisa Brochu

18 /s/Julie Funai, Esq.
19 Julie Funai, Esq.
Nevada Bar No. 8725
Keating Law Group
9130 W. Russell Road, Suite 200
Las Vegas, Nevada 89148
*Attorneys for Defendants,
Andrea Hernandez and Waldo Hernandez*

20 **ORDER**

21 IT IS SO ORDERED



22
23
24 UNITED STATES MAGISTRATE JUDGE
25
26
27
28

1-18-2022

DATED: _____

Karla Livingston

From: jblum@wileypetersenlaw.com
Sent: Wednesday, January 12, 2022 3:26 PM
To: Felicia Galati; 'Marjorie Hauf'; 'Cara Xidis'; 'Julie Funai'
Cc: Karla Livingston; cpascal@wileypetersenlaw.com
Subject: RE: Activity in Case 2:20-cv-00103-GMN-VCF Hoy v. Hernandez et al Order on Stipulation

You may sign for me.

Jonathan D. Blum, Esq.



1050 Indigo Drive, Suite 200B
Las Vegas, Nevada 89145
Office 702.910.3329 | Mobile 702.443.0677
jblum@wileypetersenlaw.com
www.wileypetersenlaw.com



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From: Felicia Galati <fgalati@ocgas.com>
Sent: Wednesday, January 12, 2022 2:39 PM
To: Marjorie Hauf <Mhauf@CourtRoomProven.com>; Cara Xidis <Cxidis@CourtRoomProven.com>;
jblum@wileypetersenlaw.com; Julie Funai <jfunai@keatinglg.com>
Cc: Karla Livingston <klivingston@ocgas.com>
Subject: FW: Activity in Case 2:20-cv-00103-GMN-VCF Hoy v. Hernandez et al Order on Stipulation

Sorry, all, but we forgot to include the close of discovery deadline in the Stipulation (ECF No. 83). Attached is a stipulation to address that date alone. Please advise if we have your authority to e-sign the attached. Thank you.

Felicia Galati, Esq., Shareholder
Olson Cannon Gormley & Stoberski
9950 West Cheyenne Avenue
Las Vegas, Nevada 89129
PH: 702-384-4012
FX: 702-383-0701

Karla Livingston

From: Marjorie Hauf <Mhauf@CourtRoomProven.com>
Sent: Wednesday, January 12, 2022 7:34 PM
To: jblum@wileypetersenlaw.com; Felicia Galati; Cara Xidis; 'Julie Funai'
Cc: Karla Livingston; cpascal@wileypetersenlaw.com
Subject: RE: Activity in Case 2:20-cv-00103-GMN-VCF Hoy v. Hernandez et al Order on Stipulation

Me as well

From: jblum@wileypetersenlaw.com <jblum@wileypetersenlaw.com>
Sent: Wednesday, January 12, 2022 3:26 PM
To: 'Felicia Galati' <fgalati@ocgas.com>; Marjorie Hauf <Mhauf@CourtRoomProven.com>; Cara Xidis <Cxidis@CourtRoomProven.com>; 'Julie Funai' <jfunai@keatinglg.com>
Cc: 'Karla Livingston' <klivingston@ocgas.com>; cpascal@wileypetersenlaw.com
Subject: RE: Activity in Case 2:20-cv-00103-GMN-VCF Hoy v. Hernandez et al Order on Stipulation

You may sign for me.

Jonathan D. Blum, Esq.



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Cc: Karla Livingston <klivingston@ocgas.com>
Subject: FW: Activity in Case 2:20-cv-00103-GMN-VCF Hoy v. Hernandez et al Order on Stipulation

Karla Livingston

From: Julie Funai <jfunai@keatinglg.com>
Sent: Friday, January 14, 2022 11:58 AM
To: Felicia Galati; Marjorie Hauf
Cc: jblum@wileypetersenlaw.com; Cara Xidis; Karla Livingston; cpascal@wileypetersenlaw.com; Anna Agustin
Subject: RE: Activity in Case 2:20-cv-00103-GMN-VCF Hoy v. Hernandez et al Order on Stipulation

Permission to esign.

From: Felicia Galati <fgalati@ocgas.com>
Sent: Thursday, January 13, 2022 1:26 PM
To: Marjorie Hauf <Mhauf@courtroomproven.com>
Cc: jblum@wileypetersenlaw.com; Cara Xidis <Cxidis@courtroomproven.com>; Julie Funai <jfunai@keatinglg.com>; Karla Livingston <klivingston@ocgas.com>; cpascal@wileypetersenlaw.com
Subject: Re: Activity in Case 2:20-cv-00103-GMN-VCF Hoy v. Hernandez et al Order on Stipulation

Julie,

Please advise. Thank you.

Sent from my iPhone

On Jan 12, 2022, at 7:34 PM, Marjorie Hauf <Mhauf@courtroomproven.com> wrote:

Me as well

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